

Draft Questionnaire for candidates to the 2020 ICC Judicial Election

Civil society¹ plays an important role in monitoring the election of International Criminal Court (ICC) officials. We promote fair, merit-based and transparent elections.

Please answer the questions below.

Name: Miatta Maria SAMBA
Nationality: Sierra Leonean
Nominating State: Sierra Leone
Legal Background (List A or List B): List A
Gender: Female
Date: September 28, 2020

BACKGROUND

1. What motivates you to seek election as a judge of the International Criminal Court (ICC)?

I have spent most of my professional life engaged in the criminal justice and human rights advocacy. I strongly support international criminal justice, the rule of law, and in particular the mandate of the International Criminal Court (ICC) and the Rome Statute system.

I will welcome an opportunity to use my skills and experience gained both at the Special Court for Sierra Leone (SCSL), where I worked as Human Rights Advisor/Researcher, Witness Management Coordinator (including being an Investigator), and Assistant Trial Attorney; and my skills gained at the ICC, where I worked as a Field Operations Officer (FOO) for the Office of The Prosecutor (OTP) with a duty station in Uganda. I will want to use these skills to support the ICC judiciary in safeguarding fair processes in its strife for accountability for atrocity crimes.

I have first-hand experience of facilitating evidence from victims of atrocity crimes, having come from a post-conflict country, Sierra Leone, where because of atrocity crimes, an international criminal court, the SCSL, was set up to hold persons who bear the greatest responsibility accountable for crimes within the Statute of the SCSL.

Investigating these atrocity offences and getting witnesses, including victims, to testify at the SCSL and return home and live safely in their communities and with their perpetrators, was a very challenging assignment. I will love to share that experience with colleague Judges at the ICC.

Women were abducted and used as sex slaves, some forcibly married and impregnated, children conscripted and enlisted and used to fight in front line hostilities, victims' legs and arms amputated – I got to relate and deal with these victims without breaking down. Getting victims and witnesses to explain their experience with the tribunal is an experience that I want to share with colleagues at the ICC.

¹ This questionnaire is endorsed by the following organizations: African Center for Democracy and Human Rights Studies, UNA Sweden, Alhaq, ALTSEAN-Burma, Amnesty International, Asian Legal Resource Centre, The Australian Centre for International Justice, Congo Peace Initiative, The Colombian Commission of Jurists, FIDH, Georgian Coalition for the International Criminal Court, Human Rights Watch, Justice International, Nigerian Coalition for the ICC, No Peace Without Justice, Open Society Justice Initiative, Parliamentarians for Global Action, REDRESS, Reporters sans frontières, StoptheDrugWar.org, The Swedish Foundation for Human Rights, World Citizen Foundation, Women's Initiatives for Gender Justice, World Federalist Movement/Institute for Global Policy, and the World Renewers Organization. This questionnaire was developed with the assistance of the Coalition for the International Criminal Court Secretariat.

I am proud of my contribution to the successful prosecution of atrocity crimes within the jurisdiction of the SCSL, including securing a conviction for the crime of forced marriage as a crime against humanity for the first time in an international criminal tribunal.

Also, I will appreciate an opportunity to apply the knowledge and skills gained as a Field Operations Officer at the ICC Field Office in Uganda, including in Lira, Gulu, in Northern Uganda.

I am informed that in line with the principle of complementarity under the Rome Statute, some of the witnesses/victims whom I managed are now participating at the International Crimes Division of the Judiciary in Uganda in the prosecution of Dominic Ongwen. I feel very proud to have been a part of the journey of accountability for war crimes and crimes against humanity in Uganda.

I will appreciate an opportunity to share with colleague Judges my experience in handling victims of the most atrocious crimes and how their testimonies could be facilitated, drawing from my experience at the SCSL and the ICC/OTP in Uganda.

Whilst respecting the rights of accused persons, I will do my utmost to provide an opportunity to victims under the Rome Statute to participate in trials, a novel idea in international criminal justice.

At the end of my term, I will love to take experiences gained at the ICC and share with colleague Judges at the Sierra Leone Judiciary.

I enjoy working with people from different legal philosophies and systems. I am a Judge of the Residual Special Court of Sierra Leone (RSCSL), and I have worked for the SCSL and the ICC. I am a Fellow of the Institute for Human Rights and Development in Africa, where I led a team investigating violations of the rights of Sierra Leonean refugees. I respect diversity; I appreciate the cultures and traditions of other people, including other legal systems.

I am a great team player. As an Investigator, as a Witness Management Coordinator, as an Associate Prosecutor at the SCSL, and as a FOO at the ICC, I worked with people from different countries with different background; we worked as a team with a common objective of bringing justice through the procedures as by law provided. As a Court of Appeals Judge, I usually sit in a panel with two other Judges. When I am empanelled by the Honourable Chief Justice of Sierra Leone to sit at the Supreme Court, I sit with four other colleague Judges to hear and determine matters before us. I respect the views of other colleagues, even when I hold contrary opinions.

A lot has been done by Judges to enhance Court processes. I am aware of challenges faced by the Judiciary, including delays in delivering judgments, inconsistent and wrong decisions, and the heavy workload of Judges. I am confident that I am most suited to help with some of these challenges at the Judiciary, including its heavy workload and delays in delivering judgments. I am currently a Court of Appeals Judge, but I am also assigned to the General Criminal Division and the Special Anti-Corruption Division of the High Court of Sierra Leone. So I get to hear and determine criminal matters at the trial court and appeals. I am at the same time, the Chairperson of the Legal Aid Board Sierra Leone and a Criminal Law Lecturer at the University of Sierra Leone. I am therefore used to hard work and prioritising my job to get successful results.

2. What do you believe are the most important challenges and achievements of the ICC in its first 18 years?

Article 5 of the Rome Statute provides for the crimes within the Court's jurisdiction. After the Nuremberg and Tokyo tribunals, *ad hoc* international tribunals including the ICTY, ICTR, and the SCSL were set up to look into atrocity crimes, including Crimes against humanity, War Crimes, Genocide, and other serious violations of humanitarian law but all of these tribunals, as the names suggest were set up on *ad hoc* basis; their existence was temporary.

First, it is an achievement to have the first permanent International Criminal Court with jurisdiction to hold persons accountable for crimes under Article 5 of its Statute to wit: Genocide, Crimes against humanity, War crimes and the crime of Aggression with 123 States Parties committed to its mandate against impunity for the most horrible crimes known to humanity.

At the SCSL, victims participated at trials as witnesses for the prosecution or the defence. There was no form of reparation other than justice, which was meted out to victims after proceedings against the warring factions, the Revolutionary United Front (RUF), the Armed Forces Revolutionary Council (AFRC), the Civil Defence Force (CDF), or Charles Taylor. I refer to Articles 68, 75, and 79 of the Rome Statute and say that one of the critical achievements of the ICC is the opportunity given to victims to participate at proceedings and, where possible, the granting of reparations to victims of atrocity crimes. For me, participation by victims means that victims see themselves as part of the court system, which should encourage other victims to participate in prosecuting atrocity crimes.

The Court has held firm on the international law principle that no one is immune from prosecution of atrocity crimes, including crimes within the Court's jurisdiction on account of his/her official position. Article 27 of the Rome Statute sends a strong message that no one's official capacity shall exempt him/her from criminal responsibility under the Statute, nor shall any one's official capacity bar the Court from exercising its jurisdiction over such a person.

The development of the international criminal law jurisprudence on Heads of State immunity or the absence thereof has seen the prosecution of, inter alia, Charles Taylor, the former President of Liberia, by the SCSL; and Slobodan Milošević, ex-President of the former Yugoslavia by the ICTY. Bringing it closer to the ICC, the indictment of Umar Al Bashir, the then President of Sudan, has affirmed the principle that sitting Heads of States are not immune from prosecution for grave crimes.

I refer to paragraphs 6 and 10 of the preamble of the Rome Statute and Articles 1 and 17 of the Rome Statute and state that the Rome Statute has, under the principle of complementarity, put the responsibility to investigate and prosecute atrocity crimes on States; the ICC is a last resort and will only take responsibility to investigate and prosecute these crimes only where the State Party where these crimes are committed or by whose nationals these crimes are committed is unwilling or genuinely unable to investigate or prosecute these crimes. It is an achievement that the principle of complementarity has encouraged the prosecution of cases within the jurisdiction of the ICC at the national and regional levels. For example, Hissen Habre was tried by a Special Chamber set up by the African Union in Senegal and Dominic Ongwen, whose trial is ongoing at the International Crimes Division in Uganda. With trials at the national level by States Parties under the principle of complementarity, justice is brought to the doorsteps of victims, and I believe this will act as a deterrent to would be perpetrators.

Tied with the principle of complementarity is the need for States Parties to establish an appropriate domestic legal framework to set better standards for domestic legislation for trials of crimes within the Court's jurisdiction. International criminal law in the Rome Statute has put responsibilities on States, combatants, and non-combatants to observe the laws of war in times of conflict to ensure the preservation of life and property.

The ICC has a very robust outreach division of the Court with vibrant and informative programmes by which victims and affected communities get to understand the Court proceedings, thereby promoting the image of the Court. I am informed that the trial of Dominic Ongwen in Kampala is being broadcast in the Northern part of Uganda. The Court's broadcast/outreach makes for a better understanding of the ICC and its operations.

Statements issued by the OTP have served as a deterrent to the commission of crimes that fall under the jurisdiction of the Court.

3. What do you believe are some of the major challenges confronting the ICC and Rome Statute system currently and in the coming years?

The Rome statute sets an ambitious mandate for the ICC, which is accountability for atrocity crimes to provide justice. But the Court has faced quite a few challenges including but not limited to, the following:

- a. By their ratification, States Parties agree to comply with the provisions of the Rome Statute, including the provisions of Article 86 in Part 9 of the Statute, the responsibility to cooperate with the Court in its investigations and prosecutions, which I must state includes the responsibility to arrest and surrender suspects at the Court's request, to the Court, amongst other responsibilities.
 - The Court does not have its own enforcement officers, so it relies on States Parties and States which accept its jurisdiction to enforce its requests.
 - There have been a few decisions of the Court made pursuant to Article 87(7) of the Statute, the most recent being an Appeals Chamber decision against Jordan for the failure to arrest and surrender the then President of Sudan upon a request made by the Court.
 - As of today, my research shows that 18 individual OTP files are open; of these 5 of the proceedings involving 6 Defendants are ongoing in the trial phase;
 - 12 other cases are pending at the pre-trial stage;
 - 9 of the 12 concern suspects that are at large.
 - Despite repeated requests for their arrests and surrender, the accused have not been arrested by States Parties.
 - The Court cannot be effective if there is a lack of support from States Parties for investigations and prosecutions, including their duties to arrest and surrender, which feeds negatively into judicial proceedings.
- b. The Statute provides for the principle of complementarity, but some of the parties to the Rome Statute have still not domesticated the Statute. This makes it difficult to pursue justice for atrocity crimes at the domestic level and fully implement the complementarity principle. This will also mean that with its limited resources, the ICC will be overwhelmed with investigating and prosecuting these crimes, which could be done at the national level.

- c. Delays in delivering judgments:- Laurent Gbagbo and his co-defendant were acquitted and discharged of charges of crimes against humanity levied against them by the Prosecutor by Trial Chamber 1, but it took the Trial Chamber 1 six months to give a written reason for the discharge of charges against Laurent Gbagbo and his co-defendant. This must have stunned the victims and the affected communities.
- d. Concerns have been expressed over inconsistent decisions on similar legal and factual questions. By a majority, the appeals chambers overturned Trial Chamber III's conviction of Jean Pierre Bemba and acquitted him of charges of war crimes and crimes against humanity. Legal commentaries show that the Appeal Chamber Judges may have deviated from the accepted standard for appellate review of a Trial Chamber's factual findings.
- e. Access to the ICC is limited to States which have ratified the Rome Statute except in situations where the United Nations Security Council refers a situation to the ICC as it did for Libya and Darfur.

LEGAL SYSTEM

4. The Rome Statute seeks judges representing all of the world's major legal systems.

a) Which legal system is your country part of?

I am from a common law background. Under our system, judicial proceedings are adversarial. In contrast, judicial proceedings under the civil law system are inquisitorial/investigative in so far as the Judge becomes involved in the process by asking questions. Under the common law system, judges ask questions when there is mostly a need for clarity of certain aspects so that the Judge gets the correct evidence that should inform him/her/them is making an informed decision.

b) Please describe any knowledge or experience you have working in or with other legal systems.

I am a sitting Judge of the Residual Special Court for Sierra Leone Judges from common law, civil law and mixed legal systems. I am trained, practised and adjudicate at the domestic level under a common law system. At the international level, I have worked for two international criminal tribunals (the SCSL and ICC), with lawyers and Judges from common law, civil law and mixed legal systems.

I appreciate that the ICC considers the principal legal systems, including the common law system, and I will do my utmost to adapt better to other systems as well.

LANGUAGE ABILITIES

5. The Rome Statute requires every candidate to have excellent knowledge of and be fluent in English or French.

Article 50 of the Rome Statute provides for the official language of the Court to wit: Arabic, English, French, Chinese, Russian, Spanish. Article 50(2) provides that the working language of the Court shall be English and French.

Article 36(3)(c) provides that a Judge of the ICC must be fluent in one of the working languages of the Court to wit: English or French.

a) **What is your native language?**

My native language is Mende, and the widely spoken language in Sierra Leone is Krio. However, the official and working language in Sierra Leone is the English language.

b) **What is your knowledge and fluency in English? If it is not your native language, please give an example of your experience working in English.**

- I had my primary, secondary, and undergraduate education in the English language;
- I had my postgraduate education in the English language and wrote my exams and papers for my undergraduate and postgraduate courses in the English language.
- The working language of the Sierra Leone Judiciary is the English language.
- I do my lectures at the University of Sierra Leone in the English language and draw examination questions and mark examination scripts using the English language.
- I do public presentations in the English language.

I am therefore very knowledgeable and fluent in the English language, one of the working languages of the Court as required by the Rome Statute.

c) **What is your knowledge and fluency in French? If it is not your native language, please give an example of your experience working in French?**

My knowledge and fluency in French is basic. I studied French at School, and I had some French lectures whilst I worked for the ICC. My working knowledge of French is limited. I am happy and willing to improve my knowledge of French.

LIST A OR B CRITERIA

6. **Your response to this question will depend on whether you were nominated as a List A candidate or a List B candidate.**

I am a List A candidate, but I am also fully qualified under List B, so I shall be referring to the requirements under Article 36(3)(b)(i) and (ii).

a) **For List A candidates:**

- **How would you describe your competence in relevant areas of international law outside of the field of international criminal law, such as international humanitarian law and international human rights law?**

I hold an LLM in International Human Rights Law and Democratisation in Africa from the Centre for Human Rights, University of Pretoria, South Africa. I also hold a BA (Gen) and an LLB (Hons) from the University of Sierra Leone. I was called to the Sierra Leone Bar in 1999. I have over 20 years post Call to the Bar legal practice and judicial experience in relevant areas of the law, including international human rights and humanitarian law.

Between 2002 and 2006, I worked for the SCSL in the capacities of an Human Rights Advisor, a Witness Management Coordinator (and Investigator), and an Associate Trial Attorney. I assisted in prosecuting three members of the CDF. They bore the greatest responsibility for the commission of crimes against humanity, war crimes, and other serious

violations of humanitarian law committed in Sierra Leone beginning 30th November 1996 as proscribed by the Statute of the SCSL and its Rules of Procedure and Evidence.

I am also currently a Judge at the (RSCSL), set up by an agreement between the Government of Sierra Leone and the United Nations to carry on the residual functions of the SCSL, including to hear and determine applications on behalf of convicts, including issues dealing with their human rights, their prison conditions, issues of early release, contempt proceedings; applications on behalf of witnesses touching on their security as well as that of their family members in respect of their having testified at the SCSL; to uphold the legacy of the SCSL.

I filed communications with the African Commission on Human and Peoples Rights pursuant to the African Charter on Human and Peoples Rights during a fellowship with the Institute for Human Rights and Development in Africa (IHRDA) based in The Gambia, and when consulted by Campaign for Good Governance in Freetown, Sierra Leone. I led two teams to investigate alleged violations and discrimination of the rights of Sierra Leonean refugees by the Republic of Guinea and the State of Lybia respectively during the civil conflict in Sierra Leone. After a successful investigation, we filed communications against the two States with the African Commission of Human and Peoples' Rights, which were held to be admissible.

In the communications filed against the Republic of Guinea, the Commission found that the Republic of Guinea violated Articles 2, 4, 5, 12(5) and 14 of the African Charter and AU Convention Governing Specific Aspects of Refugee Problems in Africa, Article 4 of the 1969 OAU Convention Governing Specific Aspects of the Refugee Problem in Africa and recommended that a Joint Commission of the Sierra Leonean and the Guinea Governments be established to assess the losses by various victims to compensate the victims.

I also provided legal assistance to the UNHCR in Sierra Leone in determining the status of Liberian refugees in Sierra Leone. All of these experience show not just my academic qualifications but established competence and expertise in international law, including humanitarian and international human rights law and field experience in a professional legal capacity which is of relevance to the judicial work of the Court.

I have extensively worked on the repeal of gender discriminatory laws in Sierra Leone and I was a member of a sub-committee of the Sierra Leone Law Reform Commission that drafted the repeal in respect of the laws on abortion.

I am presently the Chairperson of the Legal Aid Board (LAB) in Sierra Leone. The LAB is a legacy project of the SCSL, which through its constitutive legislation is mandated to provide free legal services to indigent Sierra Leoneans, including legal representation, advice, mediation and other forms of dispute resolution.

b) For List B candidates:

- **How would you describe your competence in criminal law and procedure?**
- **How would you describe your experience in criminal proceedings?**

I have established competence in criminal law and procedures, at the domestic level, with relevant experience as an investigator, legal practitioner, and judge in domestic and international criminal proceedings.

- Currently, I am a Judge of the Residual Special Court for Sierra Leone and we apply the Statute of the Residual Special Court for Sierra Leone and its Rules of Procedures and Evidence.
- Between 2010 and 2015, I was a senior prosecutor at the Anti Corruption Commission, Sierra Leone, prosecuting corruption offences as proscribed by the AC Act No. 12 of 2008 and the CPA No. 32 of 1965. I led the prosecution team that successfully prosecuted and led to the conviction of the then sitting Mayor of the Capital City, Freetown, for corruption offence in *The State v Herbert George Williams and Others* (2012).
- I am currently a Judge of the Court of Appeals. I am also assigned to the General Criminal Division and the Special Anti-Corruption Division of the Trial Court, so I get to hear and determine criminal matters including sexual offence, murder, and other serious offences, both at the trial court and appeals, applying the applicable criminal law and procedures including the Sexual Offence Act of 2012 as amended, the Offences Against the Person's Act 1861 and the Criminal Procedure Act No. 32 of 1965 to name but a few. Some judgments I have delivered can be found on www.sierralii.org.
- I lecture Criminal Law at the University of Sierra Leone.
- As a legal practitioner, acting under the leading gender equality advocacy organisation, LAWYERS, made up of all female lawyers, I represented victims of sexual violence, especially children, *pro bono* prosecuting under common law and the Offences Against the Persons Act 1861 and applying the Criminal Procedure Act No. 32 of 1965.

OTHER EXPERTISE AND EXPERIENCE

The ICC is a unique institution, as such ICC judges face a number of unique challenges (including managing a regime of victims' participation and witness protection in complex situations, including of ongoing conflict). Even judges with significant prior experience managing complex criminal trials may not necessarily possess requisite skills and knowledge needed to manage these challenges.

7. **Is there any area of expertise, knowledge or skillset which you would like to enhance through workplace trainings?**

Better knowledge of civil law systems and French.

8. **Please provide examples of your legal expertise in other relevant areas such as the crimes over which the ICC has jurisdiction, the management of complex criminal and mass crimes cases, or the disclosure of evidence.**

I have legal expertise in investigating, prosecuting, and determining crimes within the jurisdiction of the ICC. I was part of the team of Investigators and Prosecutors at the SCSL who investigated the commission of and prosecuted crimes against humanity, war crimes, serious violations of Article 3 common to the four Geneva Conventions of 1948 within the jurisdiction of the SCSL. These were complex criminal and mass crimes under the jurisdiction of the SCSL. The civil war in Sierra Leone started on 21st March 1991, but the jurisdiction of the SCSL covered crimes committed within the jurisdiction of Sierra Leone beginning 30th November 1996. Together with other team members, I travelled widely in Sierra Leone, collecting relevant information and evidence, including offences relating to violence against women and children, for the Office of the Prosecutor for the prosecution of crimes within the jurisdiction of the SCSL.

As a Witness Management Co-ordinator, I maintained a database of all witnesses, including their risk assessment/levels on each contact, alternative addresses and/or contacts, and any necessary petty logistics expenses which said expenses were disclosed to the defence during trials.

9. **Please describe the aspects of your career, experience, or expertise outside your professional competence that you consider especially relevant to the work of an ICC judge.**

Article 36(8)(b) of the Rome Statute encourages States Parties to consider Judges with legal expertise in specific issues, including violence against women or children.

As an Investigator and Witness Management Coordinator for the OTP of the SCSL and as FOO for the OTP at the ICC, I managed Prosecution witnesses, most of whom were vulnerable witnesses, including women who had been abducted by members of warring factions, forcefully married, sexually violated and exploited and forcefully impregnated. I also managed children who had been abducted by members of warring factions, forcefully enlisted and conscripted, and used in front line hostilities. I managed victims whose limbs were amputated, and other body parts cut off.

In consideration of the fact that the seat of the SCSL was in the country where the crimes within the jurisdiction of the Court was committed and appreciating that victims still lived in communities with their perpetrators, as an Investigator for the OTP at the SCSL, one of the first things we did which eventually was of relevance to the work of the Court was to develop a relationship of trust with victims and complete risk assessment forms for victims, mindful not to expose our dealings with them. Most of these victims were used by the OTP as witnesses. We educated victims/witnesses on the relevance of confidentiality for their own security and their loved ones. In essence, we maintained the protection of victims and witnesses so that people did not know that they had any dealings with the Court. Operationally, the SCSL and the ICC Uganda Field Office maintained a 24/7 emergency line where victims/witnesses who were afraid or believed they were targeted because of their dealings with the Court could call and be extracted from their targeted locations.

Procedurally, for purposes of trials, based on concerns or fears expressed in risk assessment forms and/or as their risk levels changed, applications were made to Judges at the SCSL for certain protective measures, including protective measures for victims of sexual violence and children, including their testifying behind curtains or in special rooms in the presence of family member(s) or a psychosocial staff from the Witness and Victims Unit of the Registry.

The experiences above stated were relevant for the facilitation of testimonies of witnesses without fear of being targeted or without worry as to their security. It is always helpful when the witnesses know that they are protected. The witnesses also had options of entering into the Courts' protection programme, albeit that this is generally as of last resort because of the heavy burden typically put on witnesses when once they get into this programme as they will be moved together with their close relations from their insecure locations.

As a Judge assigned to the Criminal Division of the Trial Court in Sierra Leone, I have on many occasions used my experience gained in respect of facilitating evidence from especially child victims of sexual violence during trials of sexual offences. Knowledge and experience, securely dealing with victims and witnesses, including victims of sexual violence and violence against children in a manner as to facilitate their testimonies so that crimes within the jurisdiction of the Court do not go unpunished, I believe is of utmost relevance to the ICC.

EXPERIENCE AND PERSPECTIVE RELATED TO SEXUAL AND GENDER-BASED CRIMES (SGBCs)

10. Please describe any experience you may have in dealing with SGBCs, including in addressing misconceptions relating to SGBCs.

Article 7(3) of the Rome Statute defines 'gender' as male and female. It must be, therefore, understood that gender-based violence could be committed against both males and females. However, statistics in our region do not show a high percentage of gender-based violence committed against males because many times, though these offences are committed, the stigma associated with it does not allow complaints, investigation, and/or prosecutions of gender-based violence against men/boys. The fact, however, is that these offences are committed against both males and females.

Most of the female victims I took statements from as an Investigator for the OTP of the SCSL were victims of sexual and gender-based violence. These female victims were abducted by warring factions in Sierra Leone, especially by the Revolutionary United Front (RUF) and the Armed Forces Revolutionary Council (AFRC), forcefully married and impregnated sexually exploited. At the early stages of investigations into the crimes within the jurisdiction of the SCSL, some of these victims of sexual violence still lived with their perpetrators in the same communities for fear of being targeted; in other instances, they were not accepted by their relations and so instead continued living with their 'bush husbands' and children of their forceful marriage.

Dealing with these victims required the necessary expertise to get their statements and facilitate their testimonies before the Court. It was essential to build a trust relationship with each victim of gender-based violence and get them to understand that it was not their fault that they had such a horrible experience. We offered necessary medical facilities for victims of SGBCs, as most of them, unfortunately, suffered from sexually transmitted diseases. All such contacts and management remained documented for purposes of disclosure to the defence.

Once a relationship of trust had been established and maintained, in consultation with the Witness and Victims Unit of the Court, victims of SGBCs who were to serve as witnesses for the OTP at the SCSL were given familiarization tours of the Court because most of them had never been to Court and knew nothing about what goes on in Court. They then got to realise that they will get to see their perpetrators or persons who are charged with offences against them; at this realization, there were changes in risk assessments and the necessity for making certain protective applications for protective measures including testifying behind curtains, video link or with psychosocial staff or family relation(s) in the room where the victim makes her testimony.

As a legal practitioner, under the leading gender equality advocacy organisation, Legal Access Through Women Yearning for Equality and Social Justice (LAWYERS), I helped prosecute sexual violence, especially sexual violence against children.

As a Judge assigned to the General Criminal Division of the Trial Court, I get to hear and determine sexual offences against children. With experience gained at the Special Court of Sierra Leone in respect of handling and dealing with witnesses, I can facilitate testimonies of child victims of sexual violence who appear before me. Some of my judgments relating to SGBCs can be found at www.sierralii.org.

EXPERIENCE AND PERSPECTIVE RELATED TO CRIMES AGAINST CHILDREN

11. Please describe any experience you may have in addressing crimes against and affecting children and related issues, including dealing with child witnesses.

During the almost 11 years civil war in Sierra Leone between 1991 and 2002, children, including young girls, were abducted by the three warring factions, (RUF, AFRC and CDF) and used as wives or sexually exploited while young children under the age of 15 years were abducted were enlisted, conscripted into fighting forces and used in front line hostilities. These acts constituted crimes against humanity and serious violations of international humanitarian law within the jurisdiction of the SCSL.

In investigating and taking statements from children in respect of crimes under the Statute of the SCSL committed against them, we sought and got the consent of parents and/or guardians of these child victims before talking to them and/or taking statements from them. At times, they were at ease talking to us in the presence of their parents or guardians. It was paramount that child victims who served as witnesses or who gave information to the OTP at the SCSL understood the importance of telling the truth.

As it got closer to trials, the statements of child victims who were to serve as witnesses for the OTP were confirmed with them, in the presence of their parents/guardians or psychosocial staff of the Witness and Victims Unit of the Registry.

I also assisted in the prosecution of crimes within the jurisdiction of the SCSL, committed against children. Most child victims who served as witnesses for the OTP, SCSL, testified under protective measures including by video link with voice and/face distortion or in special rooms with their relation(s) and/or a psychosocial staff of the Witness and Victims Unit present. They were subjected to questions by the defence after their testimonies.

Whilst a legal practitioner, I assisted in the prosecution of crimes of sexual penetration against children also at the domestic level. As a sitting judge assigned to the General Criminal Division of the Trial Court and as a Judge of the Court of Appeals in Sierra Leone, I hear and determine crimes against and affecting children and/or alleged crimes committed by children both at the trial stage and at appeals.

EXPERIENCE AND PERSPECTIVE RELATED TO VICTIMS

12. Please describe any experience that you may have relevant to the right of victim participation before the ICC and reparations for victims of mass atrocities.

At the SCSL where I worked between 2002 and 2006 in the capacities of a Human Rights Advisor and Researcher, a Witness Management Co-ordinator, Investigator and Assistant Trial Attorney for the OTP. Victims participation in the Court was limited to making

statements and testifying on behalf of the prosecution or the defence. I note however that, save for their right to reparation, victims who were witnesses at the SCSL had the same rights to fair trials as victims of mass atrocities before the ICC.

As FOO in the OTP at the ICC, between October 2006 and October 2010, I managed OTP witnesses, most of whom were victims.. For the purposes of participation, the ICC recognizes two types of victims:- a person who suffers harm as a result of the commission of any of the crimes stipulated under Article 5 of the Rome Statute and organisations or institutions that have sustained harm to any of their property which is dedicated to religion, education, art, science or charitable purpose.

Individual victims apply to participate in the Court's proceedings by completing an application form for individuals and organisations and institutions apply for participation by using the application form for organisations. Once accepted as a participant by the Court, the victim is kept informed of developments in the case.

The Victims Participation and Reparation Section (VPRS) of the ICC has the primary responsibility to inform victims of their rights to participate and their rights to reparation at the end of trials. Where victims wish to participate, the VPRS assists victims to obtain legal advice and to organize their legal representation. Victims at the ICC are entitled to be assisted by legal representative of their choice through the Office of Public Counsel for Victims (OPCV). Where the victim cannot afford the service of a legal representative, the Court may, amidst its limited resources, provide partial or full financial assistant for legal representation.

Victims can participate in various ways in ICC proceedings, including giving information about atrocities to the Prosecutor for purposes of investigations and possible prosecutions; Victims have the right to participate by putting their views and concerns directly to the Judges or through their legal representative at different stages of the proceedings as considered appropriate by the Judges. The voice of the victim is independent of the voice of the Prosecutor and/or the Defence. Victims participate by their attendance and participation in hearings before the Court; make opening and closing statements before the Court and give observations to Judges at the Pre-Trial Chamber while the Court is still deciding whether to proceed with an investigation or a case or not. Victims can also participate at the ICC by presenting their views to Judges in the consideration of charges to be brought against accused persons and to ask questions to accused, witnesses or experts testifying before the Court.

Pursuant to Article 68 of the Rome Statute and in consideration of relevant factors including age, gender, health and the nature of crimes committed, (including sexual or gender violence or violence against children) and upon being advised by the Victims and Witnesses Unit, (VWU) the Court takes measures (which shall not be prejudicial to the interest of the accused and to a fair and impartial trial) to protect the safety, physical and psychological wellbeing and privacy of victims and witnesses. When victims participate as witnesses before the Court, the VWU provides administrative and logistical support to enable them to appear before the Court. Appreciating the rights of the accused to public hearing, to protect victims (including victims of sexual violence) and witnesses or an accused, the Court may, considering the views of the victim or witness, conduct proceedings or any part thereof in *camera* or allow victims and/or witnesses to testify by electronic or other special means.

Article 75 of the Rome Statute provides for reparations to victims including restitution, monetary compensation, rehabilitation or symbolic measures such as public apology in

relation to crimes for which an accused is convicted. Victims can use the standard application forms to make their requests for reparations. At the end of a trial, if a person tried for crimes within the Court's jurisdiction is found guilty, the Judges may make orders for the convicted person makes reparations to the victims for harm they suffered as a result of the crimes the accused committed. After careful consideration of the application for reparation, the Judges of the Court will decide whether an applicant is entitled to reparation.

An independent Trust Fund for Victims provided for by Article 79 of the Rome Statute complements the work of the ICC. By an order of the Court, moneys and other properties collected through fines or forfeiture are transferred to the Trust Fund for victims.

13. Do you have any specialised training and/or experience in providing protection and support to victims and witnesses participating in a case?

I have experience in providing protection and support to victims and witnesses participating in a case. At the SCSL and ICC Field Office in Uganda, I dealt with and managed mainly victims, most of whom served as witnesses for the OTP. The first and most necessary education/awareness given to victims and witnesses I dealt with in these capacities was the importance of confidentiality; that for purposes of their security and the safety of their loved ones, victims and witnesses must not disclose their dealings with the Courts.

At the SCSL, the RSCSL, and at the ICC Uganda Field Office, there is in place the 24/7 emergency security operations by which victims/witnesses who are targeted or who fear they are being targeted because of their dealings with the Courts can be extracted from their locations to a safe location.

At the SCSL, as is at the ICC, there is in place the procedural protective measure through which applications were and/or are made to the tribunal for certain protective measures for victims and witnesses. These protective measures include redactions in statements of documents, voice, and/or face distortions. In respect of crimes of sexual violence or violence against children and the aged, protective measures imposed by the tribunal could include testifying behind curtains, audio or video link or in a special room in the presence of a relative(s) or a psychologist for purposes of support and facilitating testimonies without fear.

Victims and witnesses could also get into the Court's protection program, which was the case with the SCSL and which is the case with the ICC. Upon agreements with other States, victims/witnesses, together with their close relations, are relocated to other countries. Still, because of the heavy burden, such relocation imposes on victims/witnesses, this form of protective measure usually is a last resort.

EXPERIENCE RELATED TO FAIR TRIAL CONSIDERATIONS AND THE RIGHTS OF THE ACCUSED

14. Please describe any relevant experience implementing/advocating for the rights of the accused, including any specific experience managing fair trial considerations in criminal proceedings.

I respect the rights of the accused. Sitting as a Judge in criminal matters, I ensure that accused persons are represented during trials. Where matters are mentioned, and accused persons announce their presence but unrepresented, as a Judge, I ensure that I advise on right to be defended by Counsel and the necessity for their relations to contact the Legal

Aid Board for representation on adjourned dates if they could not afford the services of lawyers.

Before the commencement of proceedings in criminal matters, I order and ensure that all documents that come into the possession of the Prosecutor during investigations, incriminating or exculpatory, are disclosed to the accused within a reasonable time so that the accused can prepare his defence.

I make sure that I am satisfied that charges read to the accused at the commencement of proceedings are put in a language that the accused person understands and that he or she understands the nature of the charge against him or her fully. Where the charges are in the English language, which is the working and official language of the Sierra Leone judiciary, but the accused does not understand nor speak English language, I ensure that a competent interpreter is assigned to the accused who can adequately translate the charge to him or her and the proceedings in Court. Where an Accused, upon the charges, read to him or her chooses to remain silent and not take a plea, I do not interpret his or her silence as his being guilty or not guilty. It is his or her right to remain silent, with no interpretation given to his choice to stay silent.

Where the offences for which they are charged are bailable offences, on applications made by defence Counsel on their behalf or my own volition, depending on the offence charged, I do grant bail as of right to Accused persons appearing before me. I ensure that an accused person or persons being tried in my Court on criminal matters are tried without undue delay. I afford them their right to question or have prosecution witnesses questioned on testimonies against them.

At the close of the Prosecutor's case, I put the Accused to his election as to how he or she may choose to come to his defence as required by Section 194 of the Criminal Procedure Act No. 32 of 1965, which gives the Accused the right to defend himself by making an unsworn statement or making a sworn statement or relying on his or her statement to the police or the Anti-Corruption Commission, as the case may. An Accused cannot be compelled to testify. Howsoever he or she chooses to defend himself or herself, I afford the Accused person to call witnesses if they desire to come to his defence under the same conditions as prosecution witnesses. I allow Accused persons to present admissible evidence if they so wish in their defence.

The burden of proof of charge(s) by the Prosecutor against Accused persons before me remains on the Prosecution; I never allow the burden to shift on the Accused.

I have been, and I still am the Chairperson for the Legal Aid Board of Sierra Leone for the past two years. I oversee the Board's activities and work with the Director to ensure that there are lawyers in courts to represent persons who fall foul of the law but could not afford the services of lawyers.

HUMAN RIGHTS AND HUMANITARIAN LAW EXPERIENCE

15. Do you have any experience working with or within international human rights bodies or courts and/or have you served on the staff or board of directors of human rights or international humanitarian law organizations? If so, please briefly describe this experience.

I have working experience filing Communications with the African Commission on Human and Peoples Rights pursuant to the African Charter on Human and Peoples Rights. I did a

Fellowship with the Institute for Human Rights and Development in Africa (IHRDA). I led a team to investigate alleged violations and discrimination of the rights of Sierra Leonean refugees by the Republic of Guinea during the civil conflict in Sierra Leone. After a successful investigation, we filed a communication against the Republic of Guinea with the African Commission of Human and Peoples' Rights, which was held to be admissible. The Commission found that the Republic of Guinea violated Articles 2, 4, 5, 12(5) and 14 of the African Charter and AU Convention Governing Specific Aspects of Refugee Problems in Africa, Article 4 of the 1969 OAU Convention Governing Specific Aspects of the Refugee Problem in Africa and recommended that a Joint Commission of the Sierra Leonean and the Guinea Governments be established to assess the losses by various victims to compensate the victims.

Also, between May and October 2002, through the Campaign for Good Governance, I was involved in the investigation involving rights of Sierra Leonean refugees, mostly women, and children, whose rights as refugees were alleged to have been violated by the State of Libya during the conflict in Sierra Leone. After a successful investigation, we filed a communication against the Republic of Libya with the African Commission of Human and Peoples' Rights, which was declared admissible by the Commission.

16. Have you ever referred to or applied any specific provisions of international human rights or international humanitarian law treaties within any judicial decision that you have issued within the scope of your judicial activity or legal experience?

Sierra Leone applies international law from the dualist perspective. This requires that national legislation be passed to incorporate international law into the domestic system, without any formal rule of hierarchy as between treaties or customary international law. The 1991 Constitution, currently in force, provides in section 40(4) for the ratification by Parliament of treaties, agreements or conventions executed by or under the authority of the President. Once ratified, the provisions of the treaties are applicable as part of the domestic law. This is certainly the case for human rights treaties implemented through the Constitution of Sierra Leone (Chapter 3), the Child Rights Act 2007 and the Anti-Corruption Act 2008 applying the UN Convention on Corruption.

I have authored two institutional report for the Justice Sector Development Programme in Sierra Leone on the issue of domestic application of international treaties as follows:

- Justice Sector Development Programme, An analysis of Human Rights Treaties Applicable in Sierra Leone (2007);
- Justice Sector Development Programme, Commentary on Human Rights Treaties Signed and/or Ratified by Sierra Leone (2006).

In a judgment on a charge of manslaughter in *The State v John Manor Sesay*, I made reference to and applied the African Charter on Human and Peoples' Rights and the International Covenant on Civil and Political Rights in examining the right to life as protected and enshrined in Chapter 3 of the 1991 Constitution of Sierra Leone. The case is reported in www.sierralii.org.

IMPLEMENTATION OF THE ROME STATUTE AND INTERNATIONAL CRIMINAL LAW

17. During the course of your judicial activity, if any, have you ever applied the provisions of the Rome Statute directly or through the equivalent national legislation that incorporates Rome Statute offences and procedure? Have you ever referred to or applied jurisprudence of the ICC, *ad hoc*, or special tribunals? If yes, please describe the context in which you did.

As a judge in the national courts of Sierra Leone, I have had limited opportunities to apply provisions of the Rome Statute in our courts. However, I have had ample opportunities to apply the general principles of international criminal law such as the principle of legality, *nulla poena sine lege* and double jeopardy in national trials. As mentioned above, I have done my utmost to protect the rights of accused and ensure that the voices and concerns of victims are considered during trials.

As a RSCSL judge, I have ample opportunity to do so as the Court applies both national and international criminal law.

EXPERIENCE AND PERSPECTIVE RELATED TO GENDER MAINSTREAMING

18. Could you share examples of when you applied a gender perspective in the course of your professional career?

Before the enforcement of the 2012 Sexual Offences Act, prosecution of sexual and other related offences was based on common law and/or the Offences Against the Persons' Act 1861 with the definition of rape to mean 'having carnal knowledge of a woman without her consent'. With experience gained at the SCSL in particular the definition of sexual related offences was extended to include sexual offences committed against males and females. While in private legal practice, I was part of LAWYERS which advocated for the criminalisation of sexual harassment in schools and workplaces. I am proud that my effort was considered resulting in the enforcement of the Sexual Offences Act 2012 as amended by the 2019 Act which now captures sexual offences against both males and females.

In my jurisdiction, legal practice is still considered a "man's" trade. Most female legal practitioners would rather seek employment as Legal Secretaries in Banks or other institution and shy away from the male dominated private practice, especially litigation. I encourage female lawyers to stay at the Bar and improve on their practice. I give both male and female Barristers appearing before me equal opportunities to present their cases.

Also, as a lecturer, I ensure gender equal opportunity. I encourage all my students, both male and female to study and work hard but considering the socio-economic dynamic between male and female students, I encourage female law students to pay attention to their course, remain focused and work hard and not be shy among their male classmates in the male dominated lecture rooms.

CRITERIA OF HIGH MORAL CHARACTER, INDEPENDENCE, IMPARTIALITY AND INTEGRITY

19. What, in your opinion, does the Rome Statute requirement of "high moral character" mean and how do you embody these characteristics? What in your opinion would be contrary to "high moral character"?

Article 36(3)(a)-Judges shall be chosen from among persons of "high moral character", impartiality, and integrity with the requisite qualification for appointment to the highest judicial office.

"High moral character" is an evaluation of an individual's stable moral state. It signifies unimpeachable personal and professional integrity built on an unwavering commitment to in the case of the ICC its institutional values. A Judge with high moral character will be a person who is impartial, full of integrity, courage, fortitude, and honesty, a person with

strong moral principles. A good person with a sound moral compass. Anything contradictory will be contrary to “high moral character”.

B. In my opinion, a Judge who is not impartial or who is dishonest cannot be said to be of high moral character. A Judge who causes serious misconduct or serious breach of his/her duties cannot be said to be of high moral character-such misconduct that is likely to cause serious harm to the proper administration of justice before the Court.

Pursuant to Article 45 of the Rome Statute and Rule 5 of the Rules of Procedure and Evidence of the ICC, each Judge takes a solemn oath to perform his/her functions as required by the Statute, including to perform his/her duties and exercise his/her powers as a Judge of the ICC honourably, faithfully, impartially, conscientiously and to respect the confidentiality of investigations and prosecutions and the secrecy of deliberations.

Therefore, a Judge who discloses facts or information acquired in the cause of his duty or a matter which is sub-judice where such disclosure is seriously prejudicial to the judicial proceedings or anyone, cannot be a Judge of high moral character.

A Judge who conceals information knowing such information is sufficiently serious to preclude him from holding office cannot be a judge of high moral character.

A Judge who abuses his office to gain unwarranted favourable treatment from authorities, officials, or professionals cannot be a Judge of high moral character.

A serious breach of duties occurs where a Judge has been grossly negligent in the performance of his/her duties or where he/she knowingly acts in contravention of his/her duties. For example, where he/she fails to comply with the duty to request a recusal from a matter knowing that there are grounds for doing so, such a Judge cannot be of high moral character.

20. Have you ever resigned from a position as a member of the bar of any country or been disciplined or censured by any bar association of which you may have been a member? If yes, please describe the circumstances.

- No, I have never resigned from my position as a member of the Bar of any country.
- I have never been disciplined by any Bar Association.
- It is important to note that the Sierra Leone Bar Association and the African Bar Association have endorsed my candidacy for the position of a Judge at the ICC.

21. It is expected that a judge shall not, by words or conduct, manifest or appear to condone bias or prejudice, including, but not limited to, bias or prejudice based upon age, race, creed, color, gender, sexual orientation, religion, national origin, disability, marital status, socioeconomic status, alienage or citizenship status.

a) What is your opinion on this expectation?

I agree that a Judge should not in any way appear to condone bias or prejudice based on any ground. A Judge must be free from actual or perceived bias. A Judge must not be prejudiced because if he/she is, she will become discriminatory; a Judge must have an open mind and base decisions on the evidence presented and the law, not based on age, race, colour, gender, sexual orientation, religion or other grounds.

Therefore, where a Judge by words or conduct, which words or conduct may cause a reasonable man to believe that that Judge is biased, such a Judge must recuse himself from the considered case. For instance at the SCSL, the Honourable Justice Geoffrey Robertson was disqualified from sitting on the panel of the *RUF case*. Counsel for the RUF accused persons applied for the disqualification of the Judge on the basis that he had, by negative comments made against the RUF, who he referred to as 'dogs of war' in his book, 'Crimes against Humanity,' formed an opinion against them. Any reasonable man would believe that by his writings, the Judge had formed an opinion against the RUF and his impartiality as a Judge was called to question by the RUF accused persons during their trials at the Special Court for Sierra Leone.

b) Have you ever been found by a governmental, legal, or professional body to have discriminated against or harassed an individual on these grounds? If yes, please describe the circumstances.

No, I have never been found by a government, legal or professional body to have discriminated against or harassed an individual on the grounds of age, race, creed, color, gender, sexual orientation, religion, national origin, disability, marital status, socioeconomic status, alienage or citizenship status or any grounds at all.

22. Are you aware of any formal allegations made about you related to professional misconduct, including allegations of sexual harassment, discrimination, or bullying, or any investigations regarding your alleged professional misconduct related to the same? If so, please explain.

No, I am not aware of any formal allegations made about me related to professional misconduct, including allegations of sexual harassment, discrimination, or bullying or any investigations regarding my alleged professional misconduct relating to the same.

23. Do you have any reason to believe that any current or former colleagues or professional contacts, if asked, would share concerns regarding your professional conduct?

No, I have no reason to believe that any current or former colleagues or professional contacts, if asked, would share concerns regarding my professional conduct.

24. Article 40 of the Rome Statute and the ICC 'Code of Judicial Ethics' requires judges to be independent in the performance of their functions.

a) What difficulties, if any, can you envisage in taking a position independent of and possibly contrary to the position of your government?

Article 40 of the Rome Statute provides for the independence of Judges. Generally, on the question of establishing standards of ethical conduct for Judges, the foundation for a robust definition and understanding is the universal United Nations Basic Principles and the Bangalore Principles of judicial conduct, which identify six core values of the Judiciary, namely: independence, impartiality, integrity, propriety, equality, competence and diligence. Without rehashing the existing literature already on independence, including regional standards, which covers institutional and personal independence (Principles 1-4, 6 and 7 of the Bangalore Principles), I wish to share personal perspectives as follows:

I refer to Article 45 and Rule 5 of the Rules of Procedure and Evidence and state that before taking up his/her duties, a Judge makes a solemn undertaking in open Court to

exercise his/her respective functions as a Judge of the ICC honourably, faithfully, impartially and conscientiously and to respect the confidentiality of investigations and prosecutions and the secrecy of deliberations.

So, going back to Article 40, I shall not engage in any activity which is likely to interfere with my judicial functions or to affect confidence in my independence. In effect, I envisage no difficulty in taking a position independent of and possibly contrary to the position of my government.

b) How would you act in cases where significant (direct or indirect) political pressure was exerted upon you and/or you and your colleagues?

As provided for by Article 40 of the Rome Statute, Judges must be independent in the performance of their functions and cannot engage in any activity which will interfere with their judicial functions or affect confidence in their independence.

Although States nominates Judges, they must, however, be careful not to allow political pressure and influence to affect their performance. The focus of Judges must be on dispensing justice and not be pressured by States Parties because this could interfere with a their judicial independence. We must not allow political pressure to derail our effort of paying attention to the evidence before us as Judges, oral and documentary, and come to an appropriate verdict.

However, where I believe that I am so politically pressured which said pressure would affect my performance, I could, pursuant to Article 41, make a request to the President of the Court for my recusal from performing a particular function, stating the reasons for my request.

25. Please describe specific measures you have undertaken to advance a work environment free of bullying, harassment, and other harmful behavior.

As a staff of the SCSL and the ICC, I worked with other staff members from different countries and different cultures and ways of life. I had colleagues who were more senior to me at both institutions. As a Witness Management Co-ordinator at the SCSL and as a Field Operations Officer for the OTP/ICC, I had staff members I supervised. I maintained a very respectable, workable relationship with all staff members and advanced an approachable relationship with staff members, especially those from other countries. I consider all humans as being equal, and I consider myself being equal to others; I, therefore, have not had the experience of being bullied nor have subjected anyone with whom I have worked on bullying, harassment or other harmful behavior. I always encourage and maintain teamwork with colleagues and other staff members to work with an institutional goal, no matter the rank.

OTHER MATTERS

26. The Rome Statute requires that judges elected to the ICC be available from the commencement of their terms, to serve a non-renewable nine-year term, and possibly to remain in office to complete any trials or appeals. A judge is expected to handle legal matters for at least seven hours per day, five days per week.

a) Do you expect to be able to serve at the commencement and for the duration of your term, if elected?

I refer to Article 36(9)(a) and Article 36(10) of the Rome Statute and state that I will be able to serve at the commencement and for a term of nine years and to remain in office to complete trials or appeals if elected. The Judiciary of Sierra Leone goes on civil vacation between July and September each year. Criminal matters that I hear and determine only go on two weeks' vacation on each of the four sessions of the Court's calendar year. The Court of Appeals does not go on vacation save for two weeks during the Christmas and Easter holidays. As a Judge, I am used to working long hours into the evening and, at times, during weekends. I use to represent children who were victims of sexual violence in Court on Saturdays because of the nature of the cases. I am therefore prepared to handle legal matters for at least seven hours per day and five days per week. and take holidays as fixed during the year. [SEP]

b) To what extent are the judicial tasks described above compliant with your expectations of work standards? Please describe any potential adaptations you may require.

I have sufficient experience working at international tribunals, having worked at the SCSL and the ICC between 2002 and 2006 and between 2006 and 2010, respectively. I am aware that the ICC, like the SCSL, deal with complex cases for which much is expected of judicial officers. The judicial tasks described in this questionnaire are as I expect of work standards for an institution like the ICC. I do not believe I will have any difficulty adapting to the workload of the Court.

27. Please feel free to address any other points here.

Thank you.